

CHAVARRIA
UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 4:25-mj-111

Plaintiff,

AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL
COMPLAINT

v.

WILLIAM ANTONIO CHAVARRIA-PEREZ,

Defendant.

STATE OF SOUTH DAKOTA)
 :ss
COUNTY OF MINNEHAHA)

I, Nathan Anderson, Special Agent with Homeland Security Investigations (HSI), and currently assigned to the Sioux Falls, South Dakota Resident Agent in Charge (RAC) Office, being duly sworn, states as follows:

1. I have been a Special Agent (SA) with HSI since March of 2020.
2. During my law enforcement career, I have become familiar with investigations involving persons involved in violations of federal law relating to 18 U.S.C. § 1546(b), Fraud and Misuse of Visas, Permits, and Other Documents in violation of federal law. One of my responsibilities is to conduct criminal investigations relating to violations of the Immigration and Nationality Act that regulates an alien's right to enter, reenter, pass through, and/or reside and work permanently in the United States.

3. The information set forth below is based upon my knowledge and the knowledge of other law enforcement officers as it relates to a federal crime

previously committed. I have not included every fact obtained pursuant to this investigation but have set forth those facts that I believe are essential to establish the necessary probable cause for the criminal complaint.

4. I respectfully submit that there is probable cause to believe William CHAVARRIA-Perez has violated 18 U.S.C. § 1546(b)(1), Fraud and Misuse of Visas, Permits, and Other Documents, in that, CHAVARRIA-Perez utilized the biographical information of William Jovani Cabrera to obtain employment with a company in Madison, South Dakota.

5. On March 6, 2025, I reviewed original Form I-9, Employment Eligibility Verification, and copies of the supporting documents provided by a company located in Madison, South Dakota. During the review, I reviewed a Form I-9 for an individual using the name William Jovani Cabrera and attesting that the individual filling out the form is a United States citizen, which is signed and dated April 3, 2023. A review of the supporting documents identified follows:

- Name: William Jovani Cabrera
- Year of Birth: 1993
- California Identification Card number: Ending in 654
- Social Security Number: Ending in 3745

6. Law enforcement databases reveal that California Identification Card number ending in 654 is not issued to William Jovani Cabrera and is not a valid number. I subsequently determined the California Identification Card number ending in 654 provided by the company is a copy of a fraudulent identification card.

7. On May 9, 2025, the Honorable Veronica L. Duffy issued a search warrant for the company located in Madison, South Dakota, to search for

evidence of use of fraudulent documents and persons using fraudulent documents for employment, to include their biometric information.

8. On May 13, 2025, HSI executed the search warrant for the company located in Madison, South Dakota. During the execution of the search warrant, HSI encountered the individual working under the name William Jovani Cabrera and transported him to the HSI Sioux Falls office.

9. At HSI Sioux Falls, South Dakota, biographical and biometric information were submitted to law enforcement databases which confirmed Cabrera's true identity is William CHAVARRIA-Perez and confirmed CHAVARRIA-Perez is a citizen and national of Nicaragua.

10. On May 13, 2025, I physically compared CHAVARRIA-Perez to the photograph on the California Identification Card number ending in 654 provided by the company. I subsequently determined the California Identification Card number ending in 654 contains a photograph of CHAVARRIA-Perez.

CONCLUSION

11. I submit that there is probable cause to believe that William CHAVARRIA-Perez committed a violation of 18 U.S.C. § 1546(b)(1), Fraud and Misuse of Visas, Permits, and Other Documents, in that, CHAVARRIA-Perez, provided a fraudulent identification document, namely a fraudulent California identification card ending in 654, for the purpose of satisfying a requirement of the employment verification system.

Wherefore, I request the issuance of a criminal complaint for the arrest of William CHAVARRIA-Perez.

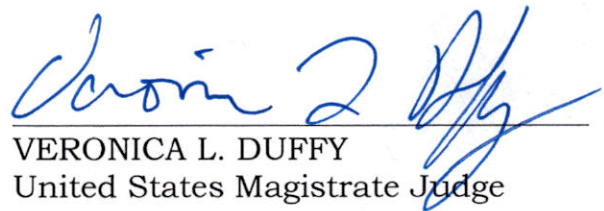
Dated this ____ day of May, 2025.



Nathan Anderson, Special Agent
Homeland Security Investigations

Sworn to and subscribed to before me this 14th day of May, 2025, at

Sioux Falls, South Dakota.



VERONICA L. DUFFY
United States Magistrate Judge